

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DAVID McCULLOUGH on behalf	:	
of himself and all others similarly situated,	:	Case No. 4:25-cv-00644-BYP
	:	
Plaintiff,	:	JUDGE BENITA Y. PEARSON
	:	
v.	:	
	:	
INSIGHT FOUNDATION OF	:	
HILLSIDE, INSIGHT FOUNDATION	:	
OF TRUMBULL, AND FIRDAUS	:	
FOUNDATION,	:	
	:	
Defendants.	:	

AFFIDAVIT OF BECKY WILLIAMS IN SUPPORT OF MOTION TO INTERVENE

Now comes Becky Williams and declares the following is true and correct:

1. I currently hold elected union office as President of Service Employees International Union (SEIU) District 1199 WV/OH/KY (“SEIU District 1199”).
2. SEIU District 1199 is a labor organization that represents approximately twenty-four thousand (24,000) employees in over two hundred and fifty (250) bargaining units across the States of Ohio, West Virginia, and Kentucky.
3. SEIU District 1199 represent five (5) bargaining units with a total of approximately one hundred and forty-five (145) employees of Insight Foundation of Trumbull and Firdaus Foundation (“Insight”).
4. At all times relevant to this action, SEIU District 1199 have been parties to two (2) collective bargaining agreements (“CBAs”) that set forth the wages, hours, and terms and

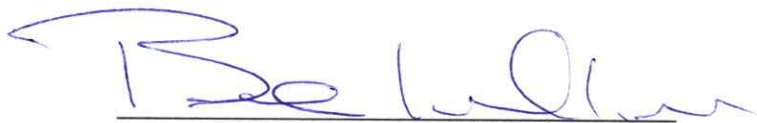
conditions of employment for each of the five (5) SEIU District 1199 bargaining unit employees. Defendants Insight have adopted each CBA.

5. On March 28, 2025, at approximately 3:50 p.m. E.D.T., Insight emailed notice (via two separate emails) to SEIU District 1199 that all bargaining unit employees represented by SEIU District 1199 and employed at Insight's facilities at 1350 East Market Street, Warren, Ohio 44482; 20 Ohltown Road, Austintown, Ohio 44515, and 2580 Elm Road, Cortland, Ohio 44410 were being laid off due to a "diversion of operations" at the Insight facilities. According to Insight, this included 134 individuals represented by SEIU 1199.
6. Since on or around March 27, 2025, employees that are members of the SEIU District 1199 bargaining units have been laid off.
7. For approximately three (3) weeks prior to the layoffs, employees that are members of the SEIU District 1199 bargaining units worked hours for which they had not paid either in full or at all.
8. Since on or around April 1, 2025, employees that are members of the SEIU District 1199 bargaining units have had no Employer-provided health care coverage.
9. The Plaintiff bringing this action, David McCullough, is not a member of any of the bargaining units represented by SEIU District 1199. As such, McCullough's wages, hours, and other terms and conditions of employment are not established by any of the two CBAs that cover SEIU District 1199 bargaining unit employees.
10. On April 2, 2025, SEIU District 1199 learned that this Class Action Complaint had been filed.

11. SEIU District 1199 seeks to intervene in this action to ensure that their rights as labor organizations and exclusive representatives of SEIU District 1199 bargaining unit employees are represented.

Further affiant sayeth naught.

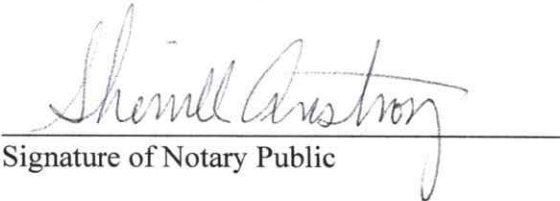
Signed:



Becky Williams
President
SEIU District 1199
1395 Dublin Road
Columbus, OH 43215

STATE OF OHIO :
COUNTY OF FRANKLIN : SS

Sworn to and subscribed before me this 4th day of April, 2025.


Signature of Notary Public

SHERRILL ARMSTRONG
Notary Public
State of Ohio
My Comm. Expires
August 29, 2025

My commission expires 8-29-2025